

**REMARKS**

Claims 1-22 are all the claims pending in the application. Claims 2-22 have been withdrawn from consideration.

**1. Preliminary Matters:**

Applicant thanks the Examiner for acknowledging the claim for foreign priority and for confirming that the certified copy of the priority document was received.

Applicant thanks the Examiner considering and initialing form PTO-1449 submitted with the Information Disclosure Statement filed on November 30, 2000.

The Examiner has indicated that formal drawings need to be filed. Applicant is submitting 10 replacement sheets that include Figures 1-10.

**2. Claim Rejections under 35 U.S.C. § 102:**

The Examiner has rejected claim 1 under 35 U.S.C. § 102(e) as being anticipated by Bailleul (US 6,477,211) [“Bailleul”]. For at least the following reasons, Applicant traverses the rejection.

Claim 1 recites that “a picture encoding system conversion device” comprises “a decoder” for “receiving picture codes...from a reception side transmission channel via an input buffer” and “a quantization step controller modifying a quantization step in compression processing of said encoder based on the information from said input buffer monitor and said output buffer monitor.” (emphasis added) Bailleul discloses two types of input buffers. The first

is located at the input to the transcoder and labeled DIB 1 (Figure 2). The second (DIB 2) is directly coupled to the transcoder output buffer (TOB) and receives data DST from the transcoder output buffer (Figure 2, col. 3, lines 41-42).

Bailleul discloses that curves A, B and C which are used to determine the Quantization Parameter (QP) are based on parameters monitored at input buffer DIB 2 (col. 4, lines 47 to col. 5, line 12, Figures 2-6). These curves are then used to determine the “fullness” of the input and output buffers ( $F_{dib}$  and  $F_{tob}$ , respectively).

Additionally, the time axis in Figures 3-6 shows that the new input buffer delay ( $\Delta T_{dib\_new}$ ) is determined after the output buffer delay ( $\Delta T_{tob}$ ) is determined, indicating that input buffer parameters are determined after the output buffer parameters and therefore, at DIB 2 not DIB 1.

Also, the input buffer fullness ( $F_{dib}$ ) of Bailleul is a calculated parameter (see Figure 3, col. 5, lines 5-9). Applicant submits that if Bailleul did monitor the reception side input buffer fullness, no such calculation would be necessary since the fullness parameter could easily be measured directly.

For at least the reasons stated above, Applicant submits that, in Bailleul, DIB 2 is used for determining the “input buffer” information that controls the quantization parameter. Applicant further submits that because DIB 2 is located downstream of the output buffer, it is not the reception side input buffer as required by the claimed combination. Therefore, Applicant requests that the rejection of claim 1 be withdrawn.


AMENDMENT UNDER 37 C.F.R. § 1.111  
U.S. Application No.: 09/725,689

Attorney Docket No.: Q62061

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Bhaskar Kakarla  
Registration No. 54,627

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

Date: December 12, 2003